

**U. S. DISTRICT COURT**  
**WESTERN DISTRICT OF NEW YORK**

Jake M. Reinhardt, Taylor M. Schmieder,  
Kevin R Harrington, Casey E. Carminati,  
Krystyna Kimbrell

Plaintiffs,

v.

Docket No.: 21- CV-206

The City of Buffalo, Clayton Reed, individually  
and in his capacity as a City of Buffalo Police  
Officer, Melissa Kurdziel, individually and in her  
capacity as a City of Buffalo Police Officer,  
et al.

Defendants.

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**Defendant Buffalo Bail Bonds Agency Inc.'s  
Reply to Plaintiffs' Memorandum in Opposition to  
Its Converted Summary Judgment Motion**

**JOY A. KENDRICK**  
Attorney at Law  
Office and Post Office Address  
**Suite 420, 534 Delaware Ave.**  
**Buffalo, New York 14202**  
**716-855-2251**

Buffalo Bail Bond Agency (hereafter also "BBBA") initially filed a motion to dismiss, which was later converted by the Court to a summary judgment motion. BBBA's original motion did not require that a separate statement of material facts, be annexed to the notice of motion, in numbered paragraphs, as required by Local R. Civ. P. 56 (a) (1) for a summary judgment motion. A compendium of BBBA's material facts are set forth in its motion papers; and it does not appear that Plaintiffs have had any problem discerning what the material facts are, as presented by BBBA.

Given the procedural background of the motion, it is contended that the court should not penalize BBBA for the omission of this separate statement, by denying its motion. If the Court deems such a statement to be necessary, then Buffalo Bail Bonds Agency should be allowed to make such a submission to the court, as the Court deems it necessary.

Plaintiffs claim that Buffalo Bail Bond Agency's motion is disingenuous, however, nothing is further from the truth. It is contended that the material facts of this case, are not disputed, and that summary judgment should be granted to Buffalo Bail Bonds Agency. Summary judgment is appropriate "[w]here the record taken as a whole could not lead a rational trier of fact to find for the non-moving party," *Matsushita Elec. Indus. Co. v. Zenith Radio Corp.*, 475 U.S. 574, 587, 106 S. Ct. 1348, 89 L. Ed. 2d 538 (1986), *Johnson v. Killian*, 680 F.3d 234, 236 (2012).

Further, only justifiable inferences of the nonmovants' evidence are to be drawn in their favor, 398 U.S., at 158-159, *Anderson v. Liberty Lobby, Inc.*, 477 U.S. 242, 255, (1986).

As a general rule, "'a party who retains an independent contractor, as distinguished from a mere employee or servant, is not liable for the independent contractor's negligent acts' " (*Brothers v New York State Elec. & Gas Corp.*, 11 NY3d 251, 257, 898 N.E.2d 539, 869 N.Y.S.2d 356 [2008], quoting *Kleeman v Rheingold*, 81 NY2d 270, 273, 614 N.E.2d 712, 598 N.Y.S.2d 149 [1993]; see *Schiffer v Sunrise Removal, Inc.*, 62 A.D.3d 776, 778, 879 N.Y.S.2d 518 [2009]). Whether an actor is an independent contractor or an employee ... is usually a factual issue for the jury. However, "[i]f the question of agency is not open to doubt, it is one for the court. *Hedeman v. Fairbanks, Morse & Co.*, 286 N.Y. 240, 248.

Clearly, the discovery conducted in this matter indicates that the question of agency is not open to doubt (see BBBA's Memorandum of Law (Dkt. 64–1), and its Supplemental Memorandum in Support of the Converted Summary Judgment Motion (Dkt. 162)), and is therefor one that this Court may decide.

This conclusion, in addition to the above, is supported by the testimony of the defendant Adel Mikheail, the Pennsylvania Bounty Hunter whom Bail Shop secured to seek out a New York bail recovery agent to assist them in locating Luke Reinhardt.

There was never a perception given that Dennis White, a New York bail recovery agent, was an employee of Buffalo Bail Bonds Agency. This was clear from the testimony of Adel Mikheail. It was stated on a number of occasions that Dennis White had worked for Buffalo Bail Bonds Agency as a skip tracer (bail enforcement agent/bounty hunter) for many years and was reported by them to be very reliable; however, he was not an employee of the company, and not the only bounty hunter that BBBA had ever used (see Declaration of BBBA's President George Adu-Gyamfi, attached hereto).

Adel testified in fact, that he never asked BBBA if Dennis White was an employee or an independent contractor, with them (see Mikheail's deposition testimony attached as "Exhibit A," 111, l. 17 – 113, l. 1). He testified: "[w]hy would I asked him that? The guy's told me he worked

for Buffalo Bail Bonds. Buffalo Bond, they told me he worked for me for many years. Why I'm going to ask the guy if you're employees or this or that" (112.1. 1– 6). He later again reiterated this fact stating that Dennis White had told him that he'd been working for Buffalo Bail Bonds for many years. That's it. (112, l. 17-18).

After his initial contact with BBBA, which Adel testified had lasted only for a few minutes (189, l. 9 –12), Adel's contact was primarily with Dennis White. Adel testified that he contacted Dennis White about 5 to 6 times for updates, stating that sometimes he was unable to reach him, as he worked night security (151. l. 5 – 152. l.6) Adel had also emailed information to Dennis White on December 30, 2020 and on January 7, 2021 (see Exhibit 9 and 11 attached respectively). Dennis White had also testified that he had received a fax at a prior office which he maintained on Sawyer Avenue, Tonawanda New York (see the testimony of Dennis White included in BBBA's Supplemental Memorandum at p. 4) in addition to the one he picked up at BBBA's office.

It cannot all be reasonably inferred from the evidence, that Dennis White worked primarily from BBBA's office. Although Dennis White stated that he had worked as a bank Bounty Hunter only for BBBA, this situation differs substantially from the one cited by Plaintiffs *Carrion v. Orbit Messenger*, 82 NY2d 742 (1993). They are the movements name and forms was wired to be utilized while performing the movements work, the movements apply the driver with the workers compensation insurance, paid his weekly stadium weekly, 57% of their gross dealings and described him as an employee on a check cashing car provided to him, among other things, *id. at 743*. Buffalo Bail Bonds Agency clearly provided Dennis White with none of this; and Dennis had his own established business with its own insignias and other business paraphernalia.

Nor can it be said that the momentary use of BBBA's fax machine by Dennis White is sufficient to classify him as an employee of that business, and the evidence does not support the conclusion that he primarily worked out of BBBA's office.

It is clear from Adel Mikheail,'s testimony that he did not believe that Dennis White was an employee of Buffalo Bail Bonds Agency; and you cannot reasonably infer from the evidence that BBBA held Dennis White out as possessing the authority to act on its behalf, thereby creating an agency by estoppel, as argued by Plaintiffs. Nor are the exceptions cited by plaintiffs under paragraph C supported by the evidence; shortly following BBBA's referral of Adel Mikheail to Dennis White, there was no further contact between Buffalo Bail Bonds Agency, Adel or Bail Shop.

Nor does the evidence support BBBA's involvement in a conspiracy as there was little communication with the defendants and no involvement following the referral of Mikheail to Dennis White, for assistance. Nor was BBBA Dennis White's employer, and their alleged failure to vet Dennis White's competency to act as a bounty hunter did not cause the harm alleged.

## **CONCLUSION**

As a result of the above it is respectfully contended that defendant Buffalo Bail Bonds Agency's motion for summary judgment should be granted; and such further and different relief as to this Court seems just and appropriate.

Dated: Buffalo, New York  
September 29, 2023

Respectfully Submitted,

s/Joy A. Kendrick

Joy A. Kendrick



**U. S. DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK**

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Jake M. Reinhardt, Taylor M. Schmieder,  
Kevin R Harrington, Casey E. Carminati,  
And Krystyna Kimbrell

Plaintiffs,

v.

Docket No.: 21- CV-206

The City of Buffalo, Clayton Reed, individually  
and in his capacity as a City of Buffalo Police  
Officer, Melissa Kurdziel, individually and in her  
capacity as a City of Buffalo Police Officer,  
et al.

Defendants.

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I, George Adu-Gyamfi, declare under penalty of perjury pursuant to 28 USCS §1746, that  
the foregoing is true and correct:

1. I am the President and Chief Executive Officer of Buffalo Bail Bonds Agency, Inc., (hereafter Buffalo Bail Bonds Agency) which has been engage in the business only of writing bail bond insurance, since 2009, pursuant to section 6802 of the New York insurance law.

2. From time to time since the inception of the business in 2009, it has been necessary to obtain the services of a bail recovery agency, in the situation where a bond has been issued for an individual, and that individual has failed to appear in court, as scheduled. Since its inception until February, 2021, Buffalo Bail Bonds Agency has utilized the services of four different bail recovery businesses, aside from the bail recovery business operated by the defendant Dennis White.



3. During the time that Buffalo Bail Bonds Agency utilized the services provided by Dennis White as a bail recovery agent, Buffalo Bail Bonds Agency was unaware of the customer base that Dennis White may or may not have maintained, as it had nothing to do with the operations of his business.

4. Please also know that your declarant faced a serious, long term, debilitating medical situation during the earlier part of this year (2023), and the latter months of 2022; as a result, your declarant was unable to personally represent the business at its deposition; but the business instead, was represented by its business associate/ employee, bail bond agent Tweneboa Saow.

Dated: Buffalo, New York  
September 29, 2023

Buffalo Bail Bonds Agency, Inc.

by

s/George Adu-Gyamfi

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George Adu-Gyamfi, President



**Adel Mikhaeil - Mr. Davenport - 04/25/2023**

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12:20:01 1 Q. Okay. Did George ask you to send to  
12:20:03 2 him or Buffalo Bail Bonds, information about this  
12:20:06 3 fugitive that they were looking for?

12:20:08 4 A. Yeah. I think I believe he asked me so  
12:20:15 5 I called Bail Shop, I asked Sheila, and she said  
12:20:18 6 yeah, it's okay to e-mail them the files,  
12:20:21 7 information on the guy.

12:20:26 8 So I e-mail it, it came out blank. They  
12:20:28 9 told me that the e-mail was sent came out blank.  
12:20:32 10 So I told Bail Shop that my paper came out blank so  
12:20:38 11 he provide a fax number and they faxed it to him.

12:20:49 12 Q. Okay. And during your conversation  
12:20:51 13 with George, did you specifically ask if this  
12:20:53 14 bounty hunter was an employee of Buffalo Bail  
12:20:55 15 Bonds?

12:20:55 16 A. Oh, yeah. He say that he's very  
12:20:58 17 reliable, he's been working for him for quite some  
12:21:01 18 time.

12:21:05 19 Q. Okay. Did George specifically refer to  
12:21:07 20 this bounty hunter as an employee of Buffalo Bail  
12:21:09 21 Bonds?

12:21:09 22 A. Yeah, he told me that this is my guy.

12:21:16 23 Q. But did he say this is my employee of

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12:21:19 1 Buffalo Bail Bonds?

12:21:19 2           **A.**    He -- I have a reliable bounty hunter  
12:21:22 3 that work for me.

12:21:23 4           **Q.**    Okay. Did you ask him, you know, is  
12:21:27 5 this an independent contractor, is this an employee  
12:21:30 6 of Buffalo Bail Bonds, did you ask him those  
12:21:32 7 questions?

12:21:33 8           **A.**    No. I'm -- sir, I was not like -- I  
12:21:38 9 just get to the point what Bail Shop want so that's  
12:21:41 10 what I did.

12:21:42 11           **Q.**    Okay. Based on your understanding of  
12:21:49 12 New York Law, does it matter if this person is an  
12:21:52 13 independent contractor or employee of Buffalo Bail  
12:21:55 14 Bonds, for whether or not that individual needs a  
12:21:57 15 license to act as a bounty hunter?

12:21:59 16           **A.**    I really don't know much detail about  
12:22:07 17 New York Law. All I know, that I cannot go to New  
12:22:10 18 York and work as a bounty hunter. That's all I  
12:22:14 19 know.

12:22:14 20           To be a bounty hunter, I'd have to have --  
12:22:17 21 reside in New York and working for a bail bond  
12:22:21 22 company. So as far as me, I was out of the  
12:22:23 23 question.

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12:22:24 1 Q. Okay. Now, after your conversation  
12:22:28 2 with George, what did you do next?

12:22:31 3 A. Like nothing. After that, I probably  
12:22:37 4 got a phone call from Sheila. She say I faxed them  
12:22:44 5 the files and just please do me a favor because I'm  
12:22:48 6 very busy, just communicate with them and let me  
12:22:51 7 know if you find the guy. If they find -- locate  
12:22:53 8 the guy, you know, we'll see what we can do in next  
12:22:59 9 steps of extradition.

12:23:01 10 Q. Okay. So prior to your conversation  
12:23:04 11 with Sheila where she told you that she faxed over  
12:23:07 12 the information, you contacted Sheila to let her  
12:23:11 13 know that you spoke with Buffalo Bail Bonds,  
12:23:13 14 correct?

12:23:15 15 A. I told her before. Before. And I  
12:23:21 16 spoke to her after, let her know that they wanted  
12:23:23 17 to help, it's up to you to make the decision, and  
12:23:28 18 she said send them the e-mail of the information.

12:23:31 19 I send the e-mail -- I sent the e-mail, it  
12:23:37 20 came out blank. So he got nothing from me so I  
12:23:40 21 call her back and I say -- they called me back,  
12:23:41 22 they say here's the fax number, have them fax the  
12:23:44 23 office.

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12:23:44 1 So I don't have a fax number. I don't have  
12:23:47 2 a fax machine that work here. So they send that  
12:23:49 3 information by fax.

12:23:50 4 Q. Okay. So after your conversation with  
12:23:54 5 George, you spoke with Sheila on the phone and told  
12:23:57 6 Sheila that it was her decision to make whether or  
12:24:00 7 not to use Buffalo Bail Bonds to try to locate the  
12:24:05 8 fugitive in New York?

12:24:05 9 A. Exactly, yeah. I have to get -- I  
12:24:09 10 don't have the authority here. You understand? I  
12:24:12 11 don't have that authority.

12:24:13 12 But authority -- if I'm in Pennsylvania and  
12:24:15 13 I'm working case in Pennsylvania, I'm working the  
12:24:18 14 case in Pennsylvania. If the guy somewhere that I  
12:24:21 15 cannot go, the case go back to them.

12:24:28 16 Q. Okay. Did Sheila ask you any questions  
12:24:29 17 about compensation that they were expecting from  
12:24:34 18 Buffalo Bail Bonds or this employee working for  
12:24:36 19 Buffalo Bail Bonds?

12:24:36 20 A. I'm not --

12:24:40 21 MS. KENDRICK: I would object to the  
12:24:41 22 question. He never said it was an employee.

12:24:44 23 MR. DAVENPORT: He actually said earlier in

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12:34:47 1 I spoke to at that time or after. You know what I  
12:34:49 2 mean?

12:34:53 3 Q. Well, all right. So -- so who else did  
12:34:55 4 you speak to at Buffalo Bail Bonds besides George?

12:34:57 5 A. I spoke to Mr. White as well. I  
12:35:00 6 believe he had Mr. White call me.

12:35:05 7 Q. Okay. When did Mr. White call you?

12:35:07 8 A. I think after I finished with George  
12:35:13 9 maybe in a day or two he called me and he told me  
12:35:16 10 that the e-mail that I sent, he can't read anything  
12:35:20 11 on it.

12:35:24 12 It came out black or dark or blank so he  
12:35:27 13 said I can't use that so I said well, disregard  
12:35:29 14 that e-mail. He said give me a fax number for  
12:35:33 15 Buffalo Bail Bonds and I tell Sheila to fax it.

12:35:36 16 Q. So was the first time that Mr. White  
12:35:39 17 contacted you -- I'm sorry, I'm sorry. Wait for  
12:35:44 18 the question, Adel.

12:35:45 19 Was the first time that Mr. White contacted  
12:35:49 20 you, was to let you know that the e-mail didn't  
12:35:55 21 send through properly?

12:35:55 22 A. Yes.

12:35:55 23 Q. That was the first time Mr. White

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12:35:57 1 contacted you?

12:35:58 2           **A.** I'm not really sure which the first or  
12:36:02 3 the second time. Maybe it was a phone call before  
12:36:06 4 that. I'm not really sure.

12:36:09 5           **Q.** Okay. Now, during your phone  
12:36:13 6 conversation with Mr. White, was there anything  
12:36:18 7 else -- your first initial phone conversation with  
12:36:21 8 Mr. White, was there anything else that was  
12:36:24 9 discussed besides this blank e-mail?

12:36:26 10           **A.** Yeah. We discussed, you know, asking  
12:36:28 11 me a question about who's the guy and I told him  
12:36:31 12 that's the guy who's supposed to be in  
12:36:33 13 Pennsylvania.

12:36:34 14           I can't find him in Pennsylvania and his  
12:36:38 15 ex-girlfriend say he's somewhere, could be in New  
12:36:41 16 York. We just need to find out if he's in New York  
12:36:43 17 or he's still in Pennsylvania. So that was my  
12:36:49 18 conversation with him.

12:36:51 19           **Q.** And when you spoke with Mr. White, did  
12:36:57 20 he provide you his e-mail address?

12:36:59 21           **A.** He may. He might or might George give  
12:37:03 22 it to me. I'm not really sure which -- who gave me  
12:37:07 23 that e-mail. Him or George.

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12:37:08 1 Q. Okay. So to the best of your  
12:37:10 2 recollection, is Exhibit 9, the document that  
12:37:14 3 you're looking at, is that an e-mail from you to  
12:37:16 4 Dennis White on December 30th?

12:37:20 5 A. Yes. On December 30th, the e-mail from  
12:37:27 6 me to Buffalo Bail Bonds or Mr. White came out  
12:37:28 7 black and dark and they told me they can't see it.

12:37:32 8 They can't use this document, they can't see  
12:37:35 9 it, and they provide a fax number was given to  
12:37:37 10 Buffalo Bail Bonds.

12:37:39 11 Q. And I'm just focusing on Exhibit 9,  
12:37:42 12 what was your initial e-mail to Buffalo Bail Bonds  
12:37:46 13 for Dennis White, what did it pertain to?

12:37:49 14 A. It didn't pertain nothing because it  
12:37:52 15 didn't come out. It came out black. First page is  
12:37:57 16 black, the other stuff is blurry, you can't even  
12:38:00 17 read the document. So it could be -- you know,  
12:38:01 18 it's not useful so they want it faxed.

12:38:04 19 Q. Okay. Well, what was this e-mail  
12:38:05 20 supposed to pertain to?

12:38:06 21 A. Information -- information for the  
12:38:11 22 State of Pennsylvania about Luke Reinhardt.

12:38:18 23 Q. And Luke Reinhardt was the fugitive

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12:38:21 1 that the Bail Shop in Pennsylvania was looking to  
12:38:26 2 find and recover, correct?

12:38:28 3 **A.** Yes.

12:38:29 4 **Q.** Okay. Now, during your initial phone  
12:38:35 5 conversation with Dennis White, did you have any  
12:38:38 6 conversations with him pertaining to his license  
12:38:42 7 status?

12:38:44 8 **A.** Do I ask him license status?

12:38:47 9 **Q.** Yeah. Did you ask him if he was  
12:38:48 10 licensed?

12:38:49 11 **A.** He told me, you know, his name, that he  
12:38:54 12 worked for George, Buffalo Bail Bonds for many,  
12:38:55 13 many years. He does this case in New York for him  
12:39:02 14 blah, blah, blah, that's it.

12:39:04 15 **Q.** Okay.

12:39:04 16 **A.** And he's licensed.

12:39:08 17 **Q.** Okay. So during your initial phone  
12:39:12 18 call with Dennis, Dennis White told you that he had  
12:39:15 19 worked for many years for George; is that correct?

12:39:18 20 **A.** Yes.

12:39:19 21 **Q.** Okay. And did you ask him if his work  
12:39:23 22 was as an employee of George's or as an independent  
12:39:27 23 contractor of George's?

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12:39:28 1           **A.**     It was like why would I ask him that?  
12:39:35 2     The guy's told me he worked for Buffalo Bail Bonds.  
12:39:38 3     Buffalo Bond, they told me he worked for me for  
12:39:41 4     many years.

12:39:43 5           Why I'm going to ask the guy if you're  
12:39:47 6     employees or this or that. You know what I mean?  
12:39:49 7     It's not my bail bond company.

12:39:51 8           I'm just trying to communicate between  
12:39:54 9     bounty hunter -- to a bail bond bounty hunter to a  
12:39:57 10    bail bond. That's it.

12:40:02 11          **Q.**     All right. So you can answer with a  
12:40:03 12    yes or no, but I don't want you to answer with a  
12:40:05 13    question.

12:40:06 14          Did you ask Dennis White if he was an  
12:40:08 15    employee or an independent contractor of George's  
12:40:11 16    in Buffalo Bail Bonds?

12:40:12 17          **A.**     All he told me that he's been working  
12:40:16 18    for Buffalo Bail Bonds for many years. That's it.

12:40:22 19          **Q.**     Okay. Again, you can answer with yes  
12:40:23 20    or no. My question is, did you ask Dennis White if  
12:40:28 21    he was an employee or an independent contractor --

12:40:31 22          **A.**     No, no.

12:40:32 23          **Q.**     -- of Buffalo Bail Bonds?

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12:40:33 1           **A.**    I didn't ask that question.

12:40:36 2           **Q.**    Okay. That's all that I need. All  
12:40:38 3 right. So before your initial phone conversation  
12:40:45 4 with Dennis, did you follow up with the e-mail with  
12:40:48 5 some information about Luke Reinhardt?

12:40:51 6           **A.**    Yeah. They told me the e-mail is  
12:40:55 7 blank, they can't read it.

12:40:57 8           **Q.**    Okay. How did they tell you that the  
12:41:01 9 e-mail was blank and that they couldn't read it?

12:41:03 10          **A.**    I don't know. He might have called or  
12:41:07 11 text or whatever. So I don't -- they provide a fax  
12:41:11 12 number.

12:41:12 13                They say fax it to the office so I give  
12:41:16 14 Sheila the phone number and she fax it to them  
12:41:20 15 because they have a fax.

12:41:22 16           **Q.**    Okay.

12:41:26 17           **A.**    The e-mail was no good.

12:41:28 18           **Q.**    Okay. Now, when you said he called you  
12:41:31 19 to tell you that the e-mail was blank, who is he,  
12:41:33 20 is it George or is it Dennis?

12:41:35 21           **MR. DiJIACOMO:** Object to the form.

12:41:36 22           **THE WITNESS:** It could be either one of  
12:41:37 23 them.

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1 **BY MR. DAVENPORT:**

12:41:37 2 **Q.** What's that? Adel?

12:41:41 3 **A.** I don't remember. It could be one of  
12:41:44 4 them. I don't know who's -- who called me over two  
12:41:47 5 years ago, him or Dennis, about the fax.

12:41:52 6 But all I know, they called me to give me a  
12:41:56 7 fax number, I give it to Sheila, and she fax it to  
12:41:59 8 them. That's it.

12:42:01 9 **Q.** Okay. So Adel, it's your recollection  
12:42:03 10 that it was either George or Dennis who called you  
12:42:05 11 to tell you that the e-mail was blank?

12:42:08 12 **A.** Yes.

12:42:09 13 **Q.** Okay. But you're not sure who?

12:42:12 14 **A.** I'm not sure who, but all he know it  
12:42:15 15 was one of them. You know what I mean?

12:42:17 16 **Q.** I do. And then during that phone call  
12:42:22 17 that you received where they told you that the  
12:42:25 18 e-mail was blank, did they also provide you a fax  
12:42:29 19 number during that phone call?

12:42:30 20 **A.** Yes.

12:42:31 21 **Q.** Okay. I'm going to show you -- well,  
12:42:35 22 Adel, do you remember what that fax number was that  
12:42:37 23 they provided to you?

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12:51:54 1 update, did you have any communications with either  
12:51:58 2 Dennis White or anyone with Buffalo Bail Bonds  
12:52:00 3 pertaining to Luke Reinhardt?

12:52:02 4 **A.** Yeah, yeah. I believe they called me.  
12:52:07 5 They say they received the fax, thank you, we will  
12:52:12 6 see if we can find out if he is back in New York  
12:52:17 7 State.

12:52:17 8 **Q.** Okay. Who did you receive the phone  
12:52:20 9 call from where that individual said thank you, we  
12:52:23 10 received the fax?

12:52:24 11 **A.** I think it could be two phone calls.  
12:52:28 12 One from White. It could be from Mr. White. You  
12:52:33 13 know what I mean?

12:52:34 14 That he went to the office to pick up the  
12:52:35 15 fax or whatever. He introduce himself and, you  
12:52:40 16 know, he said that he got the file from George and  
12:52:42 17 he's going to try to see if the guy's in New York.

12:52:48 18 **Q.** Okay. Now, did you have any texting  
12:52:57 19 communications with Dennis White during this time?

12:53:01 20 **A.** It could be. It could be, you know, a  
12:53:03 21 phone call or text a few times.

12:53:07 22 **Q.** Okay. Do you remember when you had  
12:53:10 23 texting conversations with Dennis White?

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**Adel Mikhaeil - Mr. Davenport - 04/25/2023**

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13:19:39 1           Q.     Okay. Now, in trying to locate  
13:19:50 2 Luke Reinhardt -- well, actually, first before we  
13:19:55 3 get there.

13:19:56 4           You -- you agree with me, right, that you  
13:19:58 5 received a phone call from Sheila Smith a few days  
13:20:02 6 after the fax was sent, where she was looking for  
13:20:04 7 an update, correct?

13:20:06 8           A.     Right.

13:20:06 9           Q.     Okay. And after you received that  
13:20:08 10 phone call from Sheila, what did you do next?

13:20:11 11          A.     She asked me to -- I tell her why don't  
13:20:17 12 you just call the guy and ask him. She says can  
13:20:20 13 you please just reach out and see if you have any  
13:20:22 14 update and I say okay.

13:20:26 15          I called the guy and I ask him if you have  
13:20:28 16 any update on the guy. He -- he told me he's still  
13:20:34 17 trying to find out if it was here or if it's in  
13:20:40 18 Pennsylvania. We're still looking for him.

13:20:41 19          I said we just need to locate him to see if  
13:20:44 20 he's in New York. If he's in New York, just let us  
13:20:48 21 know. That's it.

13:20:49 22          Q.     Okay. So -- so your phone conversation  
13:20:52 23 was with Dennis White shortly after Sheila Smith

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**Adel Mikhaeil - Mr. Davenport - 04/25/2023**

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13:20:54 1 asked for an update; is that correct?

13:20:56 2 **A.** Yes.

13:20:56 3 **Q.** Okay. How long did that phone  
13:20:59 4 conversation with Dennis White last for?

13:21:00 5 **A.** It last a few minutes. Yeah, I just  
13:21:15 6 called the guy and I asked him for update. He say  
13:21:18 7 he doesn't have any update yet.

13:21:20 8 **Q.** Okay. And when he called -- when you  
13:21:28 9 called looking for an update, you told Dennis White  
13:21:32 10 during that phone call that you just wanted him to  
13:21:34 11 locate Luke Reinhardt, correct?

13:21:36 12 **A.** This was the conversation from day one.  
13:21:42 13 I just say I just want to find out if he's in New  
13:21:46 14 York.

13:21:46 15 **Q.** Okay.

13:21:46 16 **A.** You know what I mean? Bail Shop wanted  
13:21:49 17 to find out if he's in New York because we don't  
13:21:53 18 know if he's still in Pennsylvania hiding  
13:21:55 19 somewhere, whatever. We just need to find out if  
13:21:57 20 he's still in New York.

13:21:58 21 So he told me he still didn't get a chance  
13:22:03 22 to do anything, but he will get back to me. So I  
13:22:06 23 called Sheila and I told him I talked to the guy

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**Adel Mikhaeil - Mr. Davenport - 04/25/2023**

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13:24:20 1 Q. Okay. Now, when was the next time that  
13:24:25 2 you had a phone conversation with either Sheila or  
13:24:29 3 Dennis pertaining to Luke Reinhardt?

13:24:33 4 A. After the incident.

13:24:38 5 Q. Okay. So you're telling me that you  
13:24:43 6 didn't have any other conversations with either  
13:24:46 7 Sheila or Dennis White prior to the incident taking  
13:24:51 8 place after that first initial request for an  
13:24:54 9 update?

13:24:55 10 A. Like between that was a couple phone  
13:24:59 11 calls. Five, six phone calls, leave a message, he  
13:25:02 12 didn't call back, any update, blah, blah, blah.

13:25:05 13 You know what I mean? Several times.  
13:25:06 14 That's it. There's nothing like -- you know what I  
15 mean?

13:25:09 16 If you -- if you reach -- send me five  
13:25:13 17 messages, I get five, six contact time with you or  
13:25:15 18 I talk to you. Whatever that, I told Sheila.

13:25:20 19 Q. Okay. So your recollection is that  
13:25:25 20 after that first initial phone call that you made  
13:25:27 21 looking for a status update from Dennis, you would  
13:25:32 22 have had several more phone conversations with  
13:25:35 23 Dennis looking for updates; is that correct?

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**Adel Mikhaeil - Mr. Davenport - 04/25/2023**

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13:25:37 1           **A.**     Like I say, I call five, maybe six  
13:25:43 2 times.   Sometime I leave a message, sometimes he  
13:25:46 3 calls back, sometimes he send me a text.   I'm  
13:25:48 4 working on it, I'm still update -- I was working  
13:25:51 5 night security, whatever.   I woke up in the  
13:25:53 6 morning, I'm going to check.

13:25:56 7           So he was not like -- like every time I call  
13:26:01 8 him, I reach him.   So you can count every time I  
13:26:04 9 attempt to call him, that was attempt to call.

13:26:13 10          **Q.**     Okay.   So I guess you would agree with  
13:26:15 11 me that there was some communication between you  
13:26:18 12 and Dennis during this time after you first  
13:26:22 13 initially contacted them for their services and  
13:26:26 14 when the incident that we're here to talk about  
13:26:29 15 ultimately happened.   Would you agree with me on  
13:26:32 16 that?

13:26:32 17          **A.**     Well, I agree with you that Bail Shop  
13:26:36 18 asked me to contact him regarding that.   You know  
13:26:40 19 what I mean?

13:26:40 20           I shouldn't be contacted because I told you  
13:26:44 21 that from day one, I shouldn't be in the middle of  
13:26:47 22 this.

13:26:48 23           My job was done in Pennsylvania.   This was

**Adel Mikhaeil - Ms. Kendrick - 04/25/2023**

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14:31:38 1 referred to some other person; is that correct?

14:31:41 2 **A.** No.

14:31:42 3 **Q.** Now, you said in your testimony that  
14:31:45 4 you believed that it was George. Are you certain  
14:31:48 5 that it was George or do you -- could it have been  
14:31:50 6 another person who answered the telephone?

14:31:52 7 **A.** Well, whoever answered the phone, they  
14:31:57 8 told me my name is George.

14:31:59 9 **Q.** Okay. And how long was the  
14:32:03 10 conversation that you had with the person that  
14:32:05 11 answered the telephone?

14:32:06 12 **A.** A few minutes, ma'am. A few minutes.

14:32:11 13 **Q.** Five minutes, less than five minutes?

14:32:13 14 **A.** I can't tell you for sure. It's been  
14:32:16 15 over two years. I'm sorry.

14:32:19 16 **Q.** Okay. You're saying it was only for a  
14:32:22 17 few minutes though?

14:32:22 18 **A.** A few minutes, five minutes, six  
14:32:25 19 minutes, seven minutes. I'm not really sure, but I  
14:32:28 20 spoke -- this is what I spoke to.

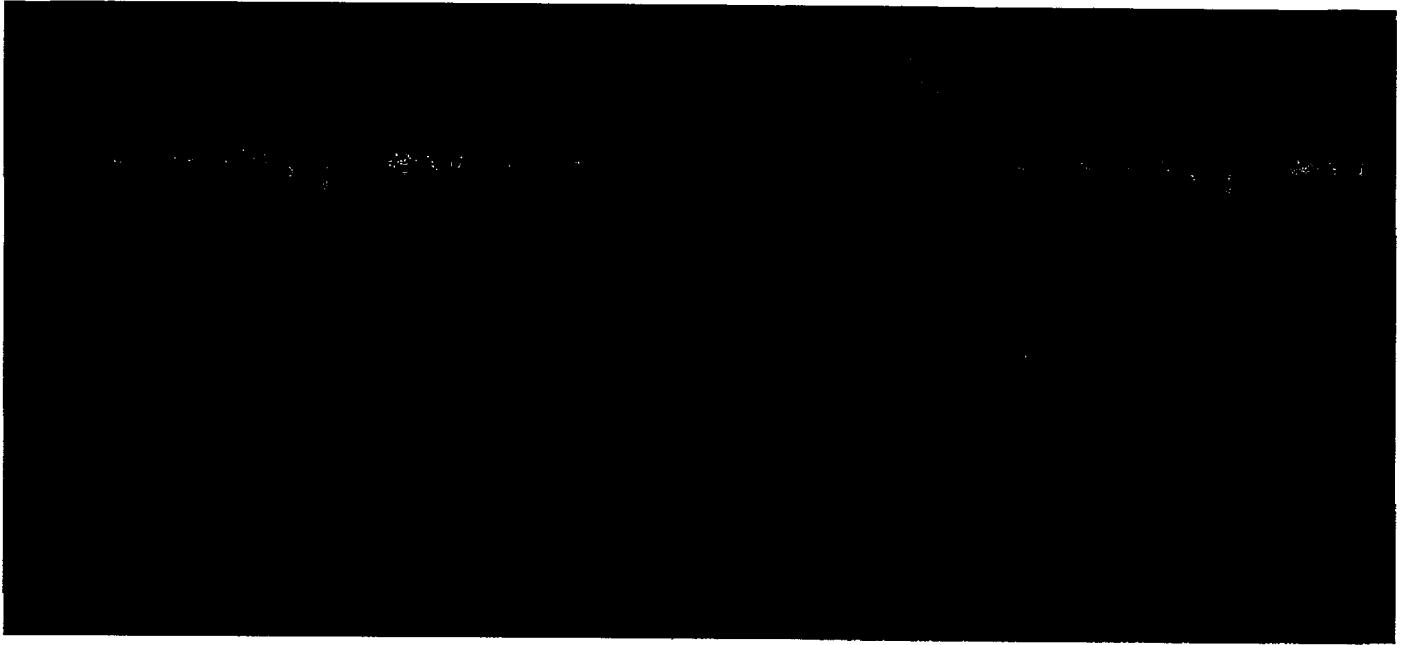
14:32:32 21 **Q.** Okay. And had you had any contact with  
14:32:38 22 Buffalo Bail Bonds Agency prior to this  
14:32:42 23 conversation that we're talking about now?

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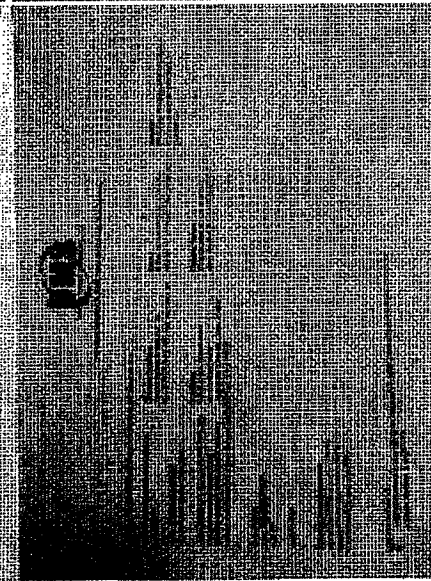
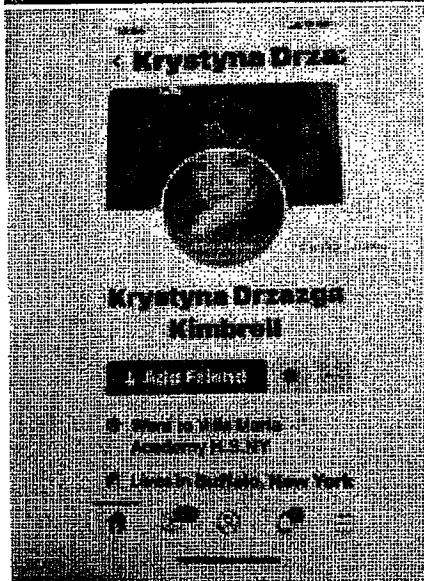
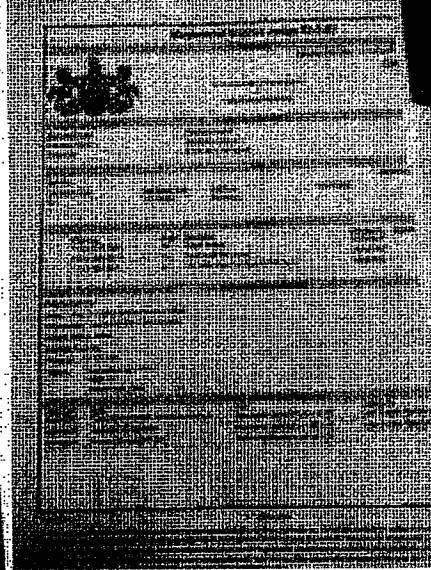


**From** adel mikhaeil u aegypt444@gmail com  
**Date:** December 30, 2020 at 5:12:25 PM EST  
**To:** Dw\_12178@aol.com  
**Subject:** Fugitive Luke Reinhardt



9/16/22, 2:59 PM

Welsberg Law, P.C. Mail - Fwd: Fugitive Luke Reinhardt

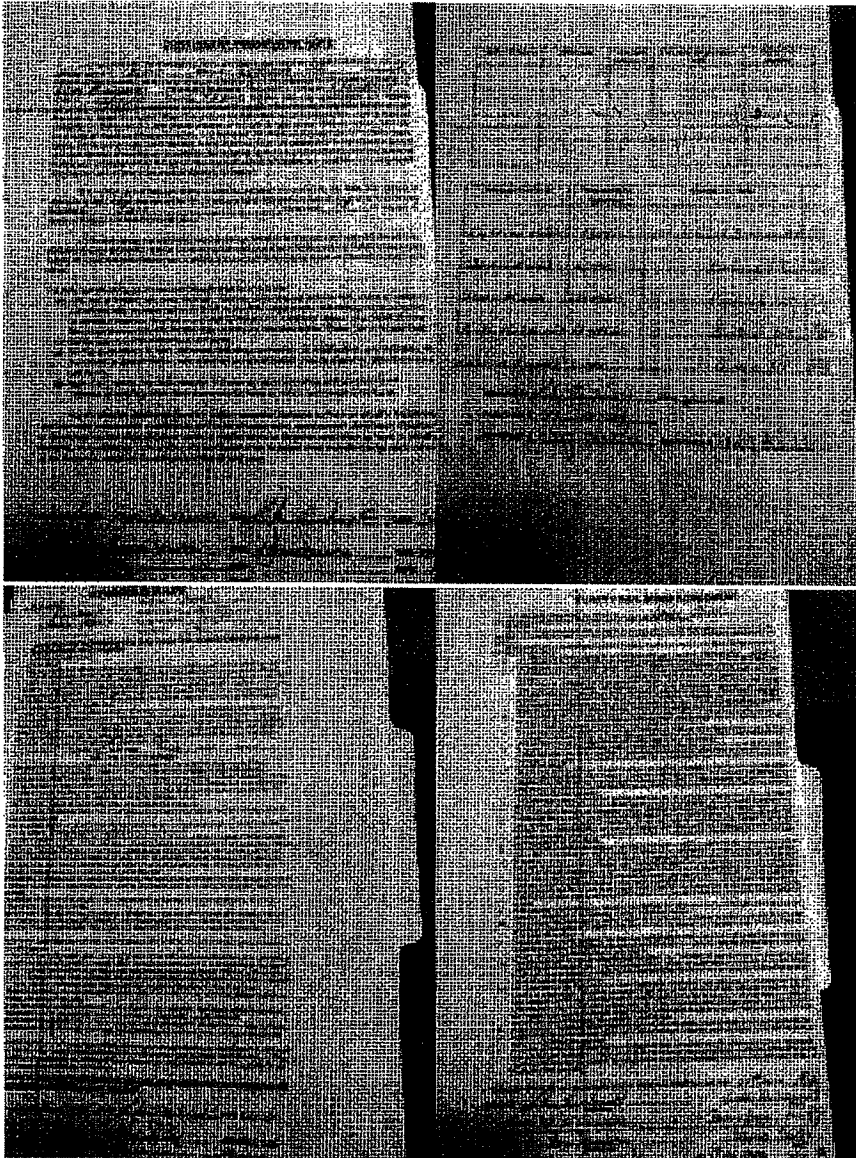


**BAIL SHOP DEFENDANTS - 10**



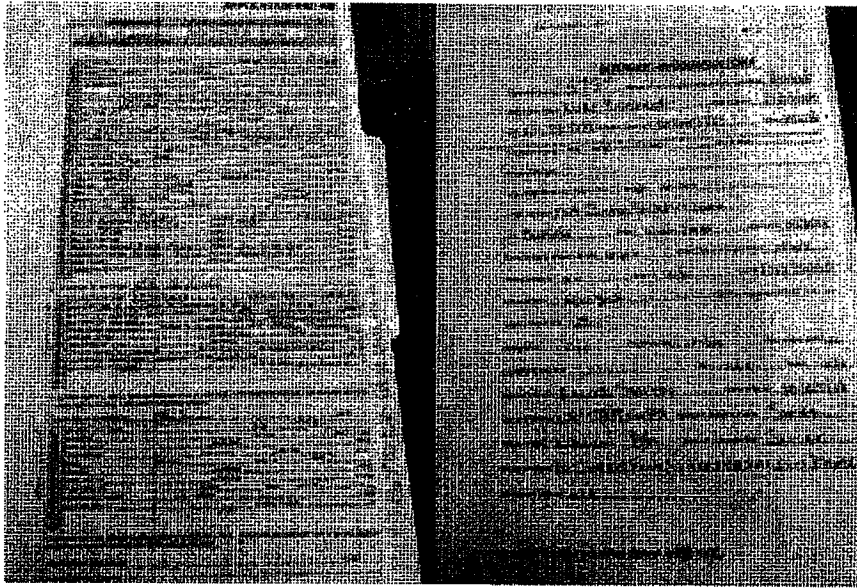
9/16/22, 2:59 PM

Welsberg Law, P.C. Mail - Fwd: Fugitive Luke Reinhardt



9/16/22, 2:59 PM

Weisberg Law, P.C. Mail - Fwd: Fugitive Luke Reinhardt



Sent from my iPhone



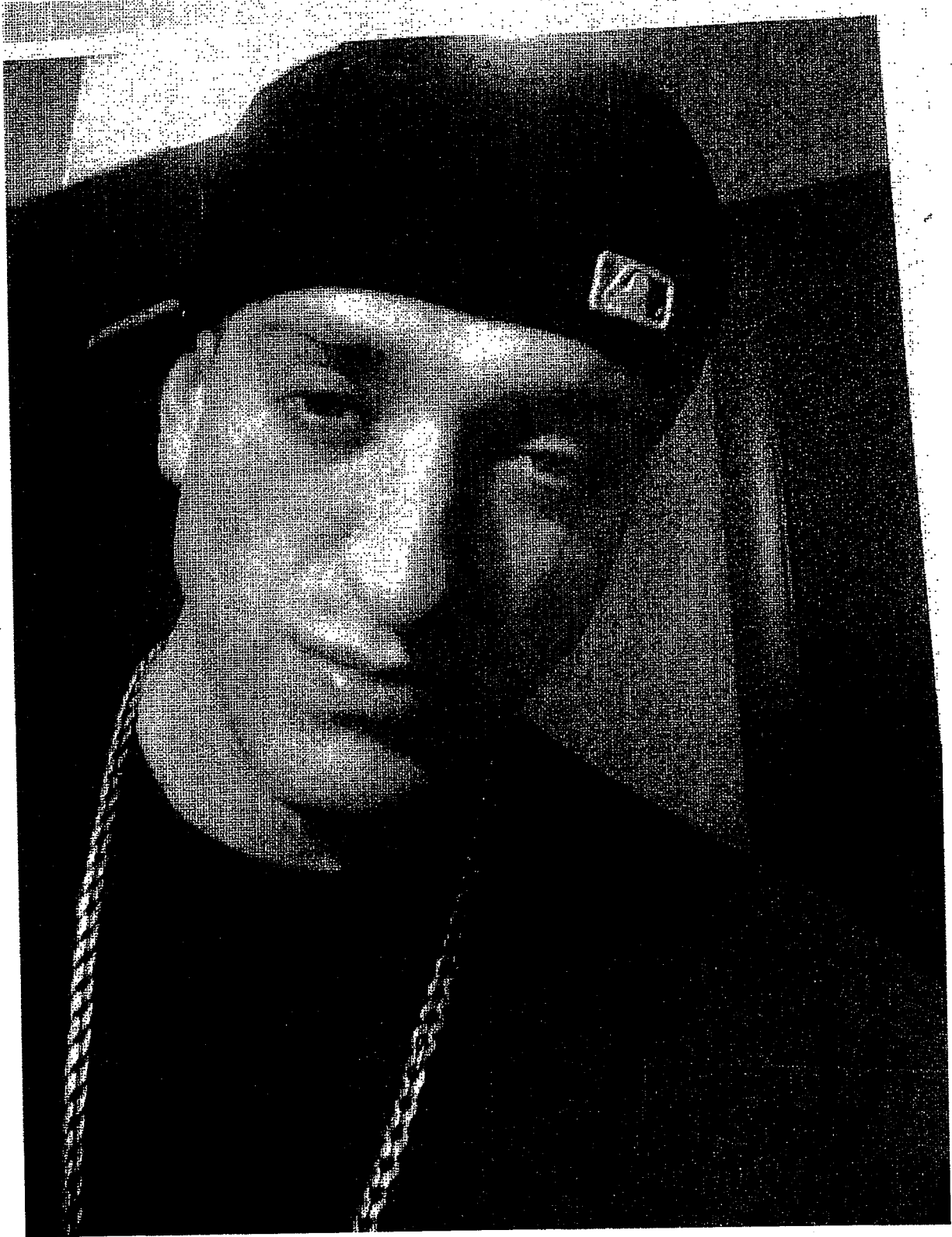


From: adel mikhael <usaegypt444@gmail.com>  
Date: January 7, 2021 at 6:06:01 AM EST  
To: Dw\_12178@aol.com  
Subject: Luke



9/16/22, 3:00 PM

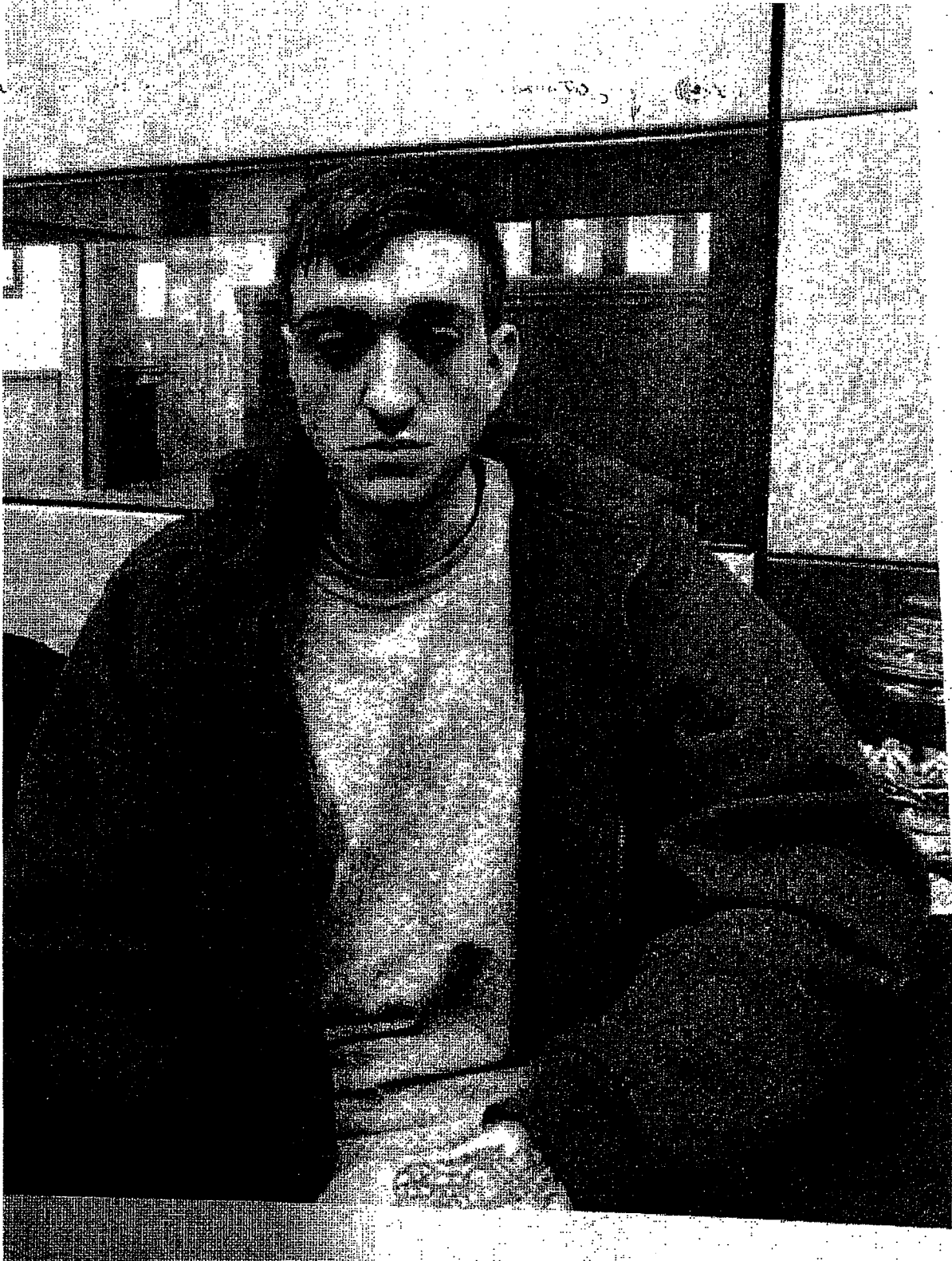
Weisberg Law, P.C. Mail - Fwd: Luke



**BAIL SHOP DEFENDANTS - 14**

9/16/22, 3:00 PM

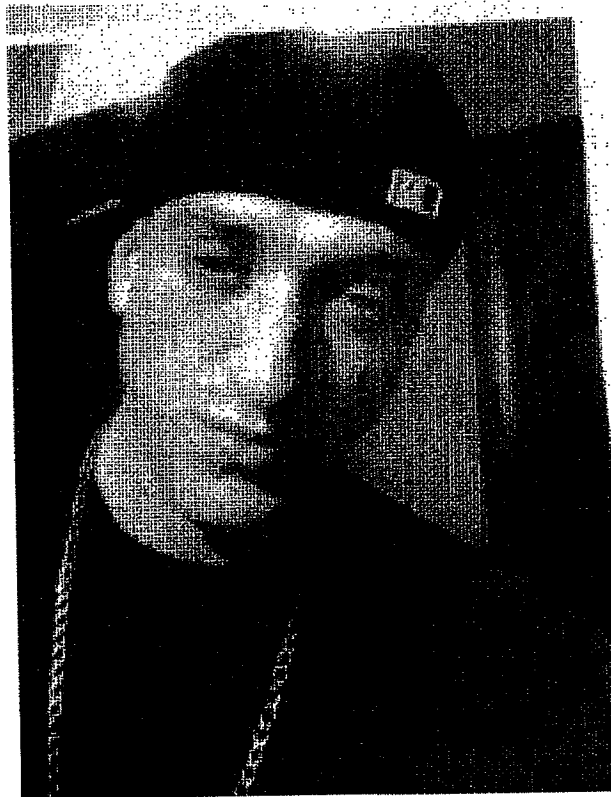
Weisberg Law, P.C. Mail - Fwd: Luke



Sent from my iPhone

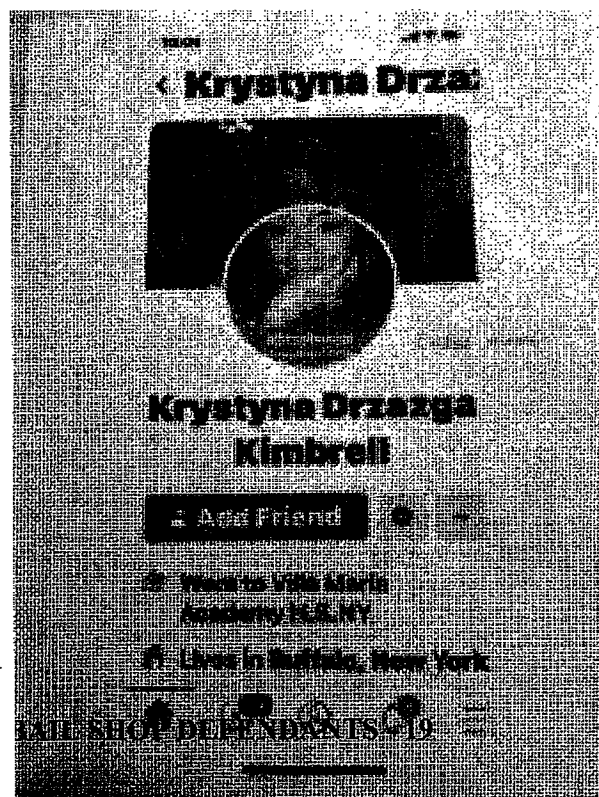
**BAIL SHOP DEFENDANTS - 15**













FOR LICENSED INVESTIGATOR PURPOSES ONLY

LUKE REINHARDT 08/03/1991-People-Search-202209221005



This report prepared by DMS Computer Forensic Investigations

LUKE G REINHARDT , 31 Years Old (Buffalo, NY, Warsaw, NY)

LUKE G REINHARDT (12/22/2009 to 08/10/2022)

SSN: 129-78-8133  
Issued: NEW YORK 1991-1993

Date of Birth: 08/03/1991  
DOB: 08/03/1991  
Age: 31

Gender: Male

Possible Email Addresses:  
lr.reinhart41@gmail.com (100%)  
lukereinhart75@gmail.com (100%)  
lukereinhart41@gmail.com (45%)  
angle.anders@yahoo.com (40%)  
babyboy34life@gmail.com (40%)

Address History (6)  
1329 CLINTON ST APT 1, BUFFALO, NY 14206-2913 (ERIE COUNTY) (01/18/2022 to 09/22/2022)  
Current Private Phone at address  
(716) 931-5664(ET) - KRYS KIMBRELL

1329 CLINTON ST, BUFFALO, NY 14206-2913 (ERIE COUNTY) (12/01/2013 to 08/10/2022)  
Address contains: 2 apartments

Possible Relatives:  
Jake M Reinhart 1988 Age: 34  
Monte A Reinhart 1956 Age: 66 Died at 53

Cities:  
Buffalo, NY (04/05/2013 to 09/22/2022)  
Warsaw, NY (01/01/2010 to 12/28/2017)

Counties:  
Erie County, NY (04/05/2013 to 09/22/2022)  
Wyoming County, NY (01/01/2010 to 12/28/2017)

Indicators

Bankruptcies: None Found  
Liens: None Found  
Judgments: 4 Found , Latest in 2021

Possible Phones

(716) 507-0749 (ET) (Mobile) (86%)  
(716) 931-5664 (ET) (VoIP) (66%)  
(585) 786-2326 (ET) (Landline) (26%)

BAIL SHOP DEFENDANTS - 20

BAIL SHOP DEFENDANTS - 21

LUKE REINHARDT 08/03/1991-People-Search-202209221005

FOR LICENSED INVESTIGATOR PURPOSES ONLY

Current Private Phone at address

(716) 931-5664(ET) - KRY'S KIMBRELL

3730 STATE ROUTE 20A W, WARSAW, NY 14569-9605 (WYOMING COUNTY) (01/01/2010 to 12/28/2017)

123 IMSON ST, BUFFALO, NY 14210-1617 (ERIE COUNTY) (12/01/2013 to 12/01/2013)

Address contains: 2 apartments

45 BAITZ AVE, BUFFALO, NY 14206-2905 (ERIE COUNTY) (12/01/2013 to 12/01/2013)

146 BAITZ AVE, BUFFALO, NY 14206-2908 (ERIE COUNTY) (04/05/2013 to 12/01/2013)

